

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

	)	DOCKET NO. 05-10520-RCL
THE PROPERTY AND CASUALTY	)	
INITIATIVE, LLC,	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA	)	
acting through the NATIONAL	)	
CREDIT UNION	)	
ADMINISTRATION,	)	
Defendant	)	

**PLAINTIFF'S MOTION FOR EXTENSION OF  
TIME IN WHICH TO ANSWER OR OTHERWISE RESPOND**

The Plaintiff, The Property and Casualty Initiative, LLC (“PCI”), hereby moves this Court to enter an order extending the time in which the Defendant, the United States of America, must answer or otherwise respond to Plaintiff’s Verified Complaint up to and including August 31, 2005. As grounds therefor, Plaintiff’s counsel asserts that settlement negotiations among the parties are continuing and that the Court’s recently established response deadline of August 15, 2005 is not sufficient to see these negotiations through. On August 2, 2005, this Court entered an Order allowing the Defendant’s assented-to motion seeking an extension, but granted the extension only to August 15, 2005, not August 31, 2005 as requested. Though the bases for seeking the extension have not materially changed since entry of the August 2 Order, the Plaintiff files this motion to demonstrate its positive need for an extension to August 31, 2005, and to avoid the possible inference that its assent to the Defendant’s motion was merely passive acquiescence.

Plaintiff further asserts that although this motion represents the fourth request for an extension of the response deadline, the additional two weeks sought should be sufficient to determine whether the parties will be able to settle this matter thereby conserving judicial resources.

WHEREFORE, the Plaintiff, The Property and Casualty Initiative, LLC, respectfully requests that this Court extend to August 31, 2005 the defendant's time to answer or otherwise respond to the Complaint.

By its attorneys,

A handwritten signature in cursive script, appearing to read "Richard E. Gentilli", written over a horizontal line.

Richard E. Gentilli

BBO # 189080

Frank F. McGinn

BBO # 564729

Bartlett Hackett Feinberg P.C.

10 High Street, Suite 920

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617/422-0200

Dated: August 8, 2005

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**CERTIFICATE OF SERVICE**

I, Frank F. McGinn, hereby certify that on August 9, 2005 true and correct copies of Plaintiff's Motion for Extension of Time in Which to Answer or Otherwise Respond were served on the individuals listed on the attached Service List, electronically or by first class mail.



Frank F. McGinn, BBO#564729  
Bartlett Hackett Feinberg P.C.  
10 High Street, Suite 920  
Boston, MA 02110

**The Property and Casualty Initiative, LLC v. United States of America**  
**Case No. 05-10520-RCL**

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